

INEOS ABS

INEOS ABS (USA) Corporation

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January 28, 2014

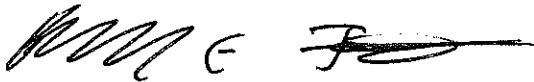
Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

RE: Consent Decree Civil Action No. 1:09-CV-545
Effective Date February 4, 2010

Dear Sirs:

Please find attached the Quarterly Report for fourth quarter 2013. Please contact me at (513) 467-2184 or bradley.fattlar@ineos.com if you have any questions concerning the submitted information.

Respectfully Submitted,



Bradley Fattlar
Air Quality Engineer
INEOS ABS (USA) Corporation

cc: M. Palermo, USEPA Region 5
B. Weinburg, OEPA
G. Bachmann, Ohio AG
B. Pray (M. Kramer), SWOAQA

INEOS ABS (USA) CORPORATION'S ADDYSTON, OH PLANT
CONSENT DECREE QUARTERLY REPORT

Consent Decree Civil Action No. 1:09-CV-545

Effective Date February 4, 2010

Reporting Period: 1/1/14 – 3/31/14

I. INTRODUCTION

The following report contains the required information about INEOS ABS' compliance activities associated with the requirements in Paragraph 50 a. and 50 b. in the Consent Decree.

II. LEAK DETECTION AND REPAIR (LDAR) REPORTING OBLIGATIONS

Per Appendix A of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

A. COMPLIANCE STATUS REPORTS

The Second Half 2013 Compliance Status Report was submitted on January 28, 2014.

B. CORRECTIVE ACTION PLANS

The FINAL Corrective Action Plan was submitted for approval on January 28, 2014. Production could not inspect all of the points by the end of February. The Environmental Audit was conducted by the end of March. The inspection and audit process is still underway.

C. CERTIFICATE OF COMPLIANCE

No certificate was required to be submitted during this period.

III. FLARE MONITORING INSTRUMENTS REPORTING OBLIGATIONS

Per Paragraph 23 of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

- Fourth Quarter 2013 Monitoring report was submitted on January 14, 2014.

IV. NONCOMPLIANCE WITH CONSENT DECREE

Per Paragraph 50 b. of the Consent Decree, INEOS ABS submitted the following letters of noncompliance to the U.S. EPA and Ohio EPA:

A. Flare NHVFG 60-minute rolling average deviation – March 7, 2014

On March 7, 2014 from 1830 to 1935 hours, the 1-hour NHVFG block average was below 200 BTU/scf. The panametrics detected low flow of 1,3-butadiene, but above 1 lb/hr. It is believed that this value is not accurate due to sensitivity of the panametrics. The violation occurred after three consecutive pressure checks of D Kettle with nitrogen. There should be very little 1,3-butadiene left in the system. The presence of nitrogen lowers the heating value of the stream making it difficult to achieve the necessary NHVFG as a 1-hour block average.

The natural gas sent to the flare was also at a maximum during this period. This was reported in the 1st Quarter 2014 flare monitoring report submitted on April 14, 2014.

V. CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

Respectfully Submitted,



Eric Cassisa
Site Manager, NAFTA
INEOS ABS (USA) Corporation

